

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN RE:  
THE FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD OF PUERTO RICO,

As representative of

THE COMMONWEALTH OF PUERTO RICO, et al

Debtor

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THE FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD FOR PUERTO RICO,

As representative of

THE COMMONWEALTH OF PUERTO RICO,

Debtor

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LESLIE JAY BONILLA SAUDER,

Movant

v.

THE FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD FOR PUERTO RICO,

As representative of

THE COMMONWEALTH OF PUERTO RICO,

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Respondant

PROMESA TITLE III

CASE NO. 17-BK-3283- LTS

(Jointly Administered)

**RE: ECF NO. 12897 and 13465**

**CREDITOR'S REQUEST FOR EXTENSION OF TIME TO REPLY TO  
OBJECTION OF THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PR TO  
MOTION REQUESTING ALLOWANCE OF POST PETITION TORT CLAIM AS PRIORITY CLAIM**

**TO THE HONORABLE COURT:**

**COMES NOW** Leslie Jay Bonilla Sauder (hereinafter "Creditor"), through the undersigned counsel, and very respectfully states and prays as follows:

1. On April 20<sup>th</sup>, 2020 creditor Leslie Jay Bonilla Sauder filed a *Motion Requesting Allowance of Post-Petition Tort Claim as Priority Claim Pursuant to the Fundamental Fairness Doctrine in Reading Co. v. Brown, 391 US 741 (1968)* filed under docket entry no. 12897.

2. The Financial Oversight and Management Board of PR as a representative of The Commonwealth of Puerto Rico (hereinafter “ Commonwealth” or “Oversight Board”) filed an *Objection of the Financial Oversight and Management Board for PR to Motion Requesting Allowance of Post-Petition Tort Claim as Priority Claim*. See docket entry no. 13465. Commonwealth alleges in its objection that creditor’s request is outside of the Reading doctrine.

3. The undersigned attorney requests from this Honorable Court an extension of time of twenty-one (21) days to file an informed answer to Oversight Board’s objection.

**WHEREFORE**, the creditor requests from this Honorable Court to grant us an extension of time of twenty-one (21) days to file and informed answer to the Oversight Board’s objection.

**RESPECTFULLY SUBMITTED**

In Caguas, Puerto Rico, this 1<sup>st</sup> day of July 2020.

**NOTICE:** Within **fourteen (14) days** after services is evidenced by the certification, and an additional **three (3) days** pursuant to Fed. R. Bank. P. P. 9006(F) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall file an objection or other appropriate response to this paper with the Clerk’s Office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (I) The requested relief is forbidden by law; (II) The requested relief is against public policy or (III) In the opinion of the Court, the interest of justice requires otherwise.

**CERTIFICATE OF SERVICE:** I CERTIFY that on this same date the foregoing document has been electronically filed WITH THE Clerk of the Court using the CM/ECF system which sends notification of such filing to all system’s participants, including the U.S. Trustee’s Office and the Trustee.

**/s/ CARLOS A. RUIZ RODRIGUEZ, ESQ.**  
USDC-PR 210009  
Attorney for Creditor  
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